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Comments in the matter of 1998 biennial Regulatory Review --
Amendment of Part 97 of the Commission's Amateur Service Rules, FCC WT
Docket 98-143.

First Principles:

No one should lose privileges
Standards must be high to instill pride and a self policing discipline
Entry level must promote growth
Must have graduated increase in privileges to encourage upgrades
Pre-1987 Technicians should be treated differently than the current Techs
and Tech+'s

Specific comments on the key areas:

A. Number of License Classes

Four classes of Technician, General, Advanced, & Extra seem reasonable, but the devil is in the details of exam elements and operating privileges. Transition to the new system is important. I agree with the FCC plan to allow current Novices and Tech+'s to continue or upgrade, while not granting any new ones. Until they upgrade however, the current Novices and Tech+'s should have no new operating privileges. I disagree with the ARRL's proposal to automatically convert Novice and Tech+'s to Generals. That's too much of a stretch and would be wholly unfair to the pre-1987 Technicians who passed the General theory exam. If the current Novices and Tech+'s are allowed to renew, some could do that indefinitely, and then you would still have 6 license classes. A compromise is to allow the current license term to run its course and not renew, forcing Novices to upgrade and Tech+'s to upgrade or revert to the Technician class.

Right now the pre-1987 Technicians are identified as Tech+ like any other Tech+. In your records please identify the pre-1987 Technicians separately and provide that information to VE's so that the proper credit can be given without placing the burden of proof on the individual to have kept a pre-1987 copy of his license.

B. Greater Volunteer Examiner Opportunities

Agree with the plan to have VEs be able to administer examination elements for which they have received credit.

C. RACES Station Licenses

The Los Angeles County Operational Area Disaster Communications Service is a very active RACES group here. Having a distinctive call sign and unit numbers of that call sign is the mechanism to know who is properly registered as a civil defense station. If RACES licenses are not renewed, then each such organization must convert itself into a club and apply for a club license. Could we then operate as unit numbers under a club license structure? If so the same system could be used.

D. Privatization of Certain Enforcement Procedures

We need enforcement with teeth. Last weekend I heard a Tech+ in the FM part of 10 meters bragging to someone on the East Coast that he really shouldn't be up there, but since the FM part of the band is quieter and he doesn't do it often, its OK. He even gave a call sign. The system must of necessity rely on attracting the kind of people who will respect the rules and when that fails, there must be consequences. Getting greater use out of the Amateur Auxiliary is a necessity. Further, the

average amateur needs to be employed. If the potential rule breaker knew that anyone hearing him would report him he might think twice. I did not understand the ARRL's specific proposal or your rebuttal to it. I for one do not understand what provisions exist today in order to make any useful suggestions for beefing up enforcement, but I urge you to get tougher. I believe most amateurs would be willing to help.

E. Telegraphy Examination Requirements

I think there should be 2 levels, traceable to the previous rules. Entry level telegraphy speed should be 5 wpm and the only other speed should be 13 wpm. The entry-level speed would be required for the entry level HF privileges, which would be the new General class. The higher speed would be required for the Advanced and Extra class. The distinction between Advanced and Extra would be in the written theory exam.

F. Written Examinations

The general topics and question pool for VEs to use should be consistent nationwide. The list of topics of Section 97.503 would be restructured to provide only 4 elements corresponding to the 4 license classes. Element 2 questions need to be absorbed in Element 3A. The topics listed are general enough to continue to have applicability. Since amateurs don't build much equipment anymore, the topic on circuit components seems less relevant than the other topics. Also, suggest a refinement of technical categories to distinguish topics related to VHF and above from HF, FM from SSB, digital from voice, etc. Questions from this more refined list would correlate better with the privileges of each license. More emphasis needs to be placed on the digital message technologies as an efficient message handling medium. To compensate for reductions in the Morse requirements, there needs to be corresponding increases in the written examination difficulty at all levels.

Written examination credit in the transition needs to be fair. The ARRL proposal would automatically give Tech+ and Novice the "Entry level HF", i.e. the new General class license. That is unfair to the pre-1987 Technician who passed the General class written exam. It is also unfair to place the burden of proof on the licensee to have kept an expired license for 11 years. We only keep income tax returns for 3 years.

We appreciate the opportunity to comment on the FCC proposal, and look forward to the final outcome.

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